

McCoy, Melinda

From: McCoy, Melinda
Sent: Tuesday, August 06, 2013 11:10 AM
To: 'barnett@adeq.state.ar.us'
Cc: Hubner, Matt
Attachments: Study Review Cklist_Tyson Grannis_MM 08.05.2013.docx; ADEQ comments on Tyson Grannis WER_mccoy input.docx

Hi Mary,

How are you doing? Matt probably mentioned this already, but I'm in the process of providing technical reviews of the three Tyson water effect ratio (WER) study final reports (Grannis, Nashville, and Waldon facilities). We thought it might be best to send you my comments on each WER study final report as I complete my technical reviews. To that end, I've finished reviewing the Tyson copper WER study for the Grannis facility, and wanted to send along my comments.

My comments can be found in the two attachments above.

The **first** attachment above includes:

1. My completed review checklists for the July and September 2011 WER test rounds and the final WER review checklist. These review checklists simply document what I reviewed and provide the information supporting my overall conclusions about the technical acceptability of the WERs.
2. My overall conclusions about the technical acceptability of the July and September 2011 WERs (see [page 8](#)). Here's a short summary of my overall conclusions:
 - **July 2011:** The total and dissolved WERs of 3.12 and 2.90, respectively, for July 2011 are technically acceptable.
 - **September 2011:** **If** it can be verified that the site water hardness was in fact 190 mg/L, the lab water hardness was 82 mg/L, and the lab water alkalinity was 58 mg/L, **then** the total and dissolved WERs of 5.31 and 5.13, respectively, for September 2011 are technically acceptable.
3. Additional comments for consideration in preparing future WERs for other facilities (note that the Grannis WER final report does **NOT** need to be revised to address these "additional comments") (see [page 9](#)).

The **second** attachment above provides:

- My additional input (in [blue font](#)) in regards to your earlier comments on the Grannis WER study final report. I thought your comments were really good and they helped me in my review as well.

As discussed in the second attachment above, EPA does consider water effect ratios to be changes to WQS and therefore they (i.e., the WERs and/or the site-specific criteria resulting from application of the WERs) must be adopted by the State and approved by EPA before they can be used in permits. In other words, WERs cannot simply be used in the permit without adopting a change to the WQS and submittal to/approval by EPA. However, when amending the WQS, there is a way to address the applicability of these site-specific criteria to surface waters such that the site-specific criteria only apply from the permitted outfall to the edge of the facility's mixing zone (see Texas example that I mention in the second attachment above). Please note that because these Tyson WERs have not yet been adopted as changes to the AR WQS and formally submitted to EPA for approval, my conclusions simply state that the WERs are "technically acceptable." These conclusions do not represent a WQS approval under CWA §303(c).

Please feel free to give me a call if you'd like me to walk you through my review and the attachments above. It's a lot of material so I will understand if you have clarifying questions. I'll be reviewing the Nashville WER next and, after that, Waldron.

Thanks so much, and hope you are doing well!!
Melinda

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